



Federal Election Commission  
Washington, DC 20463

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**SENSITIVE**

March 21, 2007

MEMORANDUM

TO: The Commission

THROUGH: Patrina M. Clark *mc*  
Staff Director

Margarita Maisonet *mm*  
Chief Compliance Officer

FROM: Deborah Ruth Kant, Director *DK*  
Alternative Dispute Resolution Office

SUBJECT: ADR 375 Friends of Duane Sand, Karen Risky, Treasurer  
Recommendation to Assign

On December 22, 2006, the ADR Office received AR 06-06 to review and determine its appropriateness for ADR processing. Based on that review, we determined that the case is appropriate for ADR, and recommend that it be assigned to the ADR Office. The ADR Analysis includes a statement of the issues, a summary and analysis of the case, an explanation of the factors supporting assignment to ADR and potential settlement terms if the case is assigned to ADR. In addition, the ADR Case Analysis Report has been reviewed by the Office of General Counsel, which concurs in the description of the case. If the Commission concurs in the recommendation, this case description will be provided to Respondents, as part of ADR Office's notification package sent to Respondents.

**ADR # 375**

**Source 06-06**

**Respondents:**

Duane Sand for Senate  
Karen Risky, Treasurer

**Respondents' Rep.:**

Karen Risky

**Referral:** Audit Division

**Committee Name:** Friends of Duane Sand

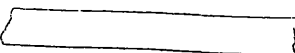
**OGC Case Open Date:** 12/18/06

**Committee Type:** Authorized

**Date Forwarded to ADRO:** 12/22/06

**District #/or State:** North Dakota

**Election - Won/Lost:** Lost



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**Election Cycle: 2004**

**Summary and Analysis of Case:** The FECA requires that political committees report information relating to the identification of each person who contributes over \$200. As relevant here, these requirements include reporting the occupation of the contributor and the name of his employer

In this case, the Audit Division determined that the Respondents (or "the Committee"), violated this provision by not adequately disclosing either the occupation and/or name of the employer on Schedule A (itemized receipts) for 747 contributions. The aggregate amount of the 747 contributions is \$143,367. Respondents contended that they used best efforts to obtain this information and that the new information was reflected in amended reports. The respondents supplied a copy of the form letter requesting this type of information. The Audit Division noted, however, the Committee did not supply copies or confirmations of the letters allegedly sent to the contributors, nor did the Committee file amended reports.

**RECOMMENDATION:**

1. **Assign ADR 375/AR 06-06 to the ADR Office.**

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